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March 11, 2019

**BY ECF AND E-MAIL**

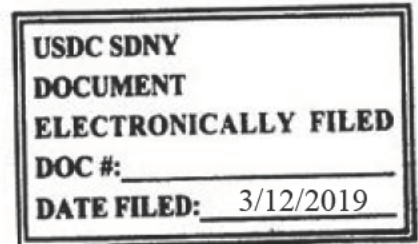
Hon. Analisa Torres

US District Judge

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007-1312



Re: Case, et al. v. City of New York, et al. -14-cv-9148 (AT)

Your Honor:

I am counsel for Plaintiffs in the above-captioned matter. I write to request that the Court extend the March 18, 2019 deadline by which Plaintiffs must file their memorandum of law; response and counter-56.1 statements; and supporting declaration and exhibits in opposition to Defendants' pending motion for summary judgment until May 8, 2019; and the April 18, 2019 deadline by which Defendants must file their response to Plaintiffs' counter-56.1 statement and their reply memorandum of law until June 5, 2019. Plaintiffs made one prior motion to extend these deadlines, which this Court granted. *See* Dkts. 126 and 127. Defendants consent to this request.

Plaintiffs make this request in light of Defendants' surprise supplemental filings in support of their motion for summary judgment, made today without any prior notice, one week before Plaintiffs' opposition papers are due to be filed, including a supplemental declaration and 56.1 statement containing broad allegations relevant to Plaintiffs' *Monell* claims and attaching 32 new exhibits consisting of over 600 pages in support thereof. Notably, Defendants first received Plaintiffs' proposed counter-56.1 statement including their proposed proof regarding Plaintiffs' *Monell* claims in November of 2018 and did not include any of the proof they now submit (or any 56.1 paragraphs addressing Plaintiffs' *Monell* claims or alleged lack thereof) in support of their motion for summary judgment. Today's surprise supplemental filings all relate to Plaintiffs' *Monell* claims. Addressing Defendants' new allegations and exhibits will require a substantial re-working of Plaintiffs' 56.1 practice and Plaintiffs' memorandum of law. The timing of the surprise supplemental filings, made one week before Plaintiffs' opposition to Defendants' papers is due, puts Plaintiffs at a severe disadvantage.

Plaintiffs therefore request until May 8, 2019 given the substantial amount of suddenly necessary work; counsel's substantial deadlines and obligations in other cases in the next six weeks; as well as counsel's part-time status due to childcare responsibilities; the need to deal with an ongoing family medical issue; a planned vacation in April; and the Passover and Easter holidays.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver

GRANTED. By **May 8, 2019**, Plaintiffs shall file their opposition. By **June 5, 2019**, Defendants shall file their reply, if any.

SO ORDERED.

Dated: March 12, 2019  
New York, New York



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ANALISA TORRES  
United States District Judge